

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Court File No. CR-21-93 (JRT/TNL)

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United States of America,  
Plaintiff,

v.

**Motion for Pretrial Disclosure of Jencks  
Act Material**

Robbin Allen Thomas,  
Defendant.

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Pursuant to Fed. R. Crim. P. 16(d)(1) and 18 U.S.C. § 3500, Defendant Robbin Allen Thomas hereby moves the Court for an order compelling the government to disclose all statements and reports within the meaning of the Jencks Act at least seven days prior to trial. The grounds for the motion are:

- 1) Pretrial disclosure of Jencks Act material will expedite the actual trial in this matter by preventing extensive delays to permit defense counsel to examine the material prior to cross-examining the witnesses;
- 2) There has been no showing of possible witness harassment or any other valid government interest which would be undermined by pretrial disclosure; and
- 3) The Court has inherent authority to order pretrial disclosure. *See United States v. Bullock*, 551 F.2d 1377 (5th Cir. 1997); *United States v. Campagnoulo*, 492 F.2d 852 (5th Cir. 1979).

This motion is based upon the files, records, and proceedings in this case and such additional arguments and authorities as may be submitted.

Respectfully submitted,

Dated: September 8, 2021

/s/ F. Clayton Tyler  
F. Clayton Tyler (11151X), [fctyler@fctyler.com](mailto:fctyler@fctyler.com)  
F. Clayton Tyler, P.A.  
331 Second Avenue South, Suite 230  
Minneapolis, MN 55401  
Ph: 612-333-7309  
Fax: 612-333-5919  
Attorney for Defendant